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11 Beverly Hills Group, Inc., Jeffery Thomas,

12 Danielle Thomas, Jacob Thomas, Randall

13 Brumbaugh, Gene O'Brien and

14 Palm Desert Management, Inc.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

29 DONNA MIKKIN, AN INDIVIDUAL, AND)
30 EDWARD MIKKIN, AN INDIVIDUAL,)

31 Plaintiffs,)

32 vs.)

33 BEVERLY HILLS GROUP, INC., a Nevada)
34 corporation, JEFFREY THOMAS, an)
35 individual, DANIELLE THOMAS, an)
36 individual, JACOB THOMAS, an individual,)
37 JAMES POE, an individual; PAULA POE,)
38 an individual, GLOBAL FORCE TRADING)
39 LIMITED, a Hong Kong private company;)
40 AND AE GROUP INVESTMENTS)

CASE NO. 16CV1046JM WVG

[Hon. Jeffrey T. Miller,
Courtroom 5D]

**NOTICE OF JOINT
SETTLEMENT AND
WITHDRAWAL OF MOTION TO
DISMISS FIRST AMENDED
COMPLAINT**

Date: Sept. 6, 2016

Time: 10:00 a.m.

Courtroom: 5D

1 LIMITED, a Nevada corporation; and
2 RANDALL BRUMBAUGH, an individual;
3 GENE O'BRIEN, an individual; DON A.
4 PARADISO, P.A., a Florida corporation, and
5 PALM DESERT MANAGEMENT INC., a
6 Nevada corporation; and Does 1 through 30,
7 inclusive.
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9 Defendant.
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Complaint Filed: April 29, 2016
Trial Date: N/A

1 Plaintiffs Donna Mikkin and Edward Mikkin and defendants Beverly Hills
 2 Group, Inc., Jeffrey Thomas, Danielle Thomas, Jacob Thomas, James Poe, Paula Poe,
 3 Global Force Trading Limited, AE Group Investments Limited, Randall Brumbaugh,
 4 Gene O'Brien and Palm Desert Management, Inc. (collectively, "the Parties") hereby
 5 advise the Court that they have reached a settlement and expect that this action will be
 6 dismissed with prejudice as soon as certain obligations are satisfied under the Parties'
 7 settlement agreement. In the interim, the Parties hereby request that the Court vacate
 8 the hearing on the pending Motion to Dismiss the First Amended Complaint, which is
 9 currently scheduled for September 6, 2016.

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 11 Dated: August 29, 2016

Respectfully submitted,

LOCKE LORD LLP

By: /s/ Michael F. Perlis

Michael F. Perlis
 Wrenn E. Chais

Attorneys for Defendants

Beverly Hills Group, Inc., Jeffery
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 Thomas, Randall Brumbaugh, Gene
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WEINTRAUB LAW GROUP PC

By: /s/ Richard A. Weintraub

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ATTESTATION

I hereby attest that the other signatories listed, on whose behalf this filing is submitted, concur in the filing's content and has authorized the filing.

Dated: August 29, 2016

LOCKE LORD LLP

By: /s/ Michael F. Perlis

Michael F. Perlis

CERTIFICATE OF SERVICE

I, Michael F. Perlis, an attorney, do hereby certify that on August 29, 2016, I electronically filed the foregoing **NOTICE OF JOINT SETTLEMENT AND WITHDRAWAL OF MOTION TO DISMISS FIRST AMENDED COMPLAINT** with the Clerk of the Court using the electronic case filing system, which will send notification of such filings to the parties registered with the Court's CM/ECF system.

Dated: August 29, 2016

By: /s/ Michael F. Perlis
Michael F. Perlis

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